

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

CHARLES LEON MANOUS, Surviving)
Spouse and Personal Representative of)
the Estate of CAROL ANN MANOUS)
deceased,)

Plaintiff,)

v.)

Case No. 5:11-cv-01330-R

MYLAN PHARMACEUTICALS, INC.,)

Defendant.)

PLAINTIFF'S EXHIBIT LIST AND WITNESS LIST

A. EXHIBIT LIST

No.	Exhibit	Description
1.	Bartling-CV	Curriculum vitae of James Bartling, Pharm.D.
2.	Bartling-Report	Summary of James Bartling's opinions.
3.	Death Certificate	Official death certificate for Carol Ann Manous.
4.	FDA-Letter dated January 28, 2005	Letter prepared by the FDA about Fentanyl Patches.
5.	Fentanyl Boxes	The boxes in which the Fentanyl patches were supplied.
6.	Funeral Bill	Funeral Bill from Eisenhour Funeral Home, Blanchard, OK
7.	Medical Examiner-Laboratory Analysis	Laboratory Analysis performed by the Medical Examiner's office which includes the Fentanyl result.
8.	Medical Examiner-Photos	Photos of Carol Ann Manous's body taken by the Medical Examiner's office.
9.	Medical Examiner-Report	Report of the Medical Examiner's office.
10.	Medical Records	Medical Records pertaining to Carol Ann Manous.

11.	Medical Records-All other medical records of Carol Ann Manous	Medical Records pertaining to Carol Ann Manous.
12.	Medical Records-Oklahoma PainCare, Inc.	Medical Records pertaining to Carol Ann Manous.
13.	Medical Records-Pardo	Medical Records pertaining to Carol Ann Manous.
14.	Medical Records-Schwartz	Medical Records pertaining to Carol Ann Manous.
15.	Medical Records-Turner	Medical Records pertaining to Carol Ann Manous.
16.	Mylan-ANDA File and Attachments	Abbreviated New Drug Application and its attached supporting documents, correspondence, test results, reports of studies, etc., all of which relate to the Mylan Fentanyl Transdermal System.
17.	Mylan-Annual Product Reviews	Annual Product Reviews from Mylan's files which were produced during discovery and which relate to Fentanyl patches.
18.	Mylan-Burkhart Paper	Document from Mylan's files which was produced during discovery which relates to Fentanyl patches and complications and injuries resulting from their use.
19.	Mylan-Condensed Development Report	Document from Mylan's files which was produced during discovery which relates to Fentanyl patches.
20.	Mylan-EIR's	Establishment Inspection Reports from Mylan's files which were produced during discovery and which relate to Fentanyl patches.
21.	Mylan-Fentanyl Studies	Fentanyl studies from Mylan's files which were produced during discovery which relate to Fentanyl patches.
22.	Mylan-Formulation Development Report	Document from Mylan's files which was produced during discovery and which relates to Fentanyl patches.
23.	Mylan-Labeling	Fentanyl Transdermal System labeling from Mylan's files which

		were produced during discovery and which relate to Fentanyl patches.
24.	Mylan-Master Batch Record	Master Batch Records from Mylan's files which were produced during discovery which relate to Fentanyl patches and their specifications.
25.	Mylan-Package Insert	Describes Fentanyl concentration which should be achieved, describes how to use the patches, etc.
26.	Mylan-Package Insert-Guide to Use	Document from Mylan's files which was produced during discovery which relates to Fentanyl patches.
27.	Mylan-Package Insert-Medication Guide	Document from Mylan's files which was produced during discovery which relates to Fentanyl patches.
28.	Mylan-Package Insert-Prescribing Information	Document from Mylan's files which was produced during discovery which relates to Fentanyl patches.
29.	Mylan-PSUR's	Product Safety Update Reports from Mylan's files which were produced during discovery and which relate to Fentanyl patches.
30.	Mylan-SOP's	Standard Operating Procedures from Mylan's files which were produced during discovery which relate to manufacturing Fentanyl patches.
31.	Pharmacy Records-Walgreens	Pharmacy records from Walgreens for Carol Ann Manous's prescriptions.
32.	Pharmacy Records-WalMart	Pharmacy records from Wal-Mart for Carol Ann Manous's prescriptions.
33.	Photos-Carol Ann Manous	Photographs of Carol Ann Manous which were taken while she was alive.
34.	U.S. Life Table	Sets forth the life expectancy of citizens of the United States.
35.	Deposition Exhibits	Exhibits to depositions of witnesses in this case.
36.	Documents disclosed during discovery	Documents produced during discovery.
37.	Excerpts of exhibits	Portions of exhibits listed elsewhere

		on this list.
38.	Exhibits listed by Defendant	Plaintiff reserves the right to use exhibits listed by the Defendant.
39.	Exhibits prepared at trial	Documents prepared during the trial of this case.
40.	Pleadings and discovery responses	Pleadings and discovery responses as necessary to authenticate, establish stipulations, establish admissions, etc.

B. WITNESS LIST

No.	Witness	Description
1.	Manous, Charles Leon c/o Norman & Edem, PLLC 127 N.W. 10 th St. Oklahoma City, OK 73103	Surviving husband of Carol Ann Manous. He will testify about damages and about his observations.
2.	Tucker, Beau c/o Norman & Edem, PLLC 127 N.W. 10 th St. Oklahoma City, OK 73103	Surviving son of Carol Ann Manous who will testify about damages.
3.	Detective Morrissey Newcastle Police Department	Detective Morrissey is the investigating officer who notified the medical examiner's office of the death of Carol Ann Manous.
4.	Turner, Greg Oklahoma Medical Examiner's Office 901 N. Stonewall Oklahoma City, OK 73117	Mr. Turner is the laboratory analyst who conducted the tests which show that Carol Ann Manous's blood Fentanyl concentration was 28.1 ng/ml.
5.	Tarau, Marius, M.D. Oklahoma Medical Examiner's Office 901 N. Stonewall Oklahoma City, OK 73117 405-239-7141	Dr. Tarau is not a retained expert, but he is a percipient expert. Dr. Tarau is the medical examiner who investigated the death of Carol Ann Manous and who signed the Medical Examiner's Report. Dr. Tarau will testify that Carol Ann Manous's cause of death was Fentanyl toxicity. Dr. Tarau will testify in accordance with his deposition in this case, which has already been taken.
6.	Curtis, Byron, Ph.D. Oklahoma Medical Examiner's Office	Dr. Curtis is not a retained expert, but is a percipient expert. Dr. Curtis is the Chief Forensic Toxicologist of the medical

	901 N. Stonewall Oklahoma City, OK 73117 405-239-7141	examiner's office. He supervised the preparation of the Medical Examiner's laboratory report and signed the report which establishes Carol Ann Manous's blood Fentanyl concentration. Dr. Curtis will testify in accordance with his deposition in this case, which has already been taken.
7.	Bartling, James W. Pharm.D., ADC Mercer University College of Pharmacy and Health Sciences 3001 Mercer University Drive, PAC-121 Atlanta, GA 30341 Office 678-547-6181 Fax 678-547-6518	Dr. Bartling is a doctor of pharmacy and is a pharmaceuticals expert. Dr. Bartling will testify in accordance with his report that the Mylan Fentanyl Transdermal System Fentanyl patches at issue were defective and unreasonably dangerous and caused Carol Ann Manous's death.
8.	Schwartz, Michael J., M.D. PO Box 85027 Yukon, OK 73058 (405) 354-8978	Dr. Schwartz is not a retained expert, but he is a percipient expert who treated Mrs. Manous prior to her death. Dr. Schwartz will testify in accordance with his medical records about the medical care which he provided to Mrs. Manous.
9.	All of Carol Ann Manous's Medical providers	Plaintiff reserves the right to call any or all of Carol Ann Manous's medical providers, or their representatives, as necessary to authenticate records, provide foundational testimony, or to testify about the facts of the care they provided to Carol Ann Manous.
10.	All witnesses deposed	Any witness who was deposed in this case.
11.	All witnesses listed by Defendant	Any witness listed by Defendant.
12.	Rebuttal Witnesses	Witnesses who will rebut Defendant's evidence.
13.	Authentication Witnesses	Witnesses, as necessary, to authenticate documents.

NORMAN & EDEM, P.L.L.C.

By: /s/ L. Mark Bonner

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CERTIFICATE OF SERVICE

I hereby certify that on March 14, 2013, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing. Based on the records currently on file, the Clerk of Court will transmit a Notice of Electronic Filing to the following ECF registrants:

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